



MEMORANDUM

DATE: January 27, 1986

TO: Pat Luedtke

FROM: Hope Wright

SUBJECT: 2010300031 — Winnebago County
Rockford/Rockford Products Plant 3
ILD005212097

2010300032 -- Winnebago County
Rockford/Rockford Products Plant 2 ✓
ILD000805895

EPA Region 5 Records Ctr.



393499

My understanding of the activities of these plants is that Plant 2 sends their waste to Plant 3. BFI picks up the combined wastes at Plant 3 every fourth day.

Plant 2 should be completing a manifest every day showing Rockford Products as Transporter #1 and BFI as Transporter #2 with BFI as the Site. Plant #3 would complete a manifest every fourth day with the waste they have generated. Four manifests from Plant #2 and one manifest from Plant #3 would accompany each load to BFI. In effect, Plant #3 is a transfer station for the waste from Plant #2, they are not a TSD Facility. Both plants would complete a Generator Annual Report but neither would need a Facility report for this waste.

The other alternative is for Plant #3 to become a Storage Facility. They would have to get a permit to accept the waste from Plant #2. In this case, Plant #2 would manifest each day to Plant #3. Plant #3 would manifest all the waste to BFI. Only Plant #3 would complete a Generator Report for the total waste, but would also complete a Facility Report for the waste accepted from Plant #2. I believe this alternative has been dismissed by all concerned.

On this basis, it appears no Facility Reports for 1982 or 1983 are necessary. If one is needed for the lagoon, please let me know.

HW:md0205F/12

cc: Division Files ✓
Greg Zak
Annual Report Files